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VIA EMAIL

Hon. Katherine B. Forrest
United States District Judge
Southern District of New York
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August 23, 2013

Re: SEC v. Fabrice Tourre, Case No. 10-cv-3229 (KBF)

Dear Judge Forrest:

We write pursuant to Your Honor's direction to submit a proposal for scheduling for post-trial proceedings in the above-referenced matter.

We respectfully submit, and the SEC concurs, that the next phase of the proceedings should be Mr. Tourre's filing of motions pursuant to Rules 50 and 59 of the Federal Rules of Civil Procedure. The parties propose that the remedy phase would follow the Court's decision on those motions, which may affect the claims remaining to be addressed in the remedy phase.

The parties have agreed on a schedule for the briefing of those motions, with Mr. Tourre filing his opening brief on September 30, 2013, the SEC filing its opposition brief on October 30, 2013 and Mr. Tourre filing his reply brief on November 13, 2013.

With respect to the anticipated renewal of Mr. Tourre's motion pursuant to Rule 50 of the Federal Rules of Civil Procedure, which was made at the close of the SEC's case and at the close of all of the evidence, we respectfully request that the Court docket and endorse as denied for the reasons set forth in the record the written motion we handed to the Court and to the SEC at the time the motion was orally presented.

Ordered: Post to docket. 8/26/13



Katherine B. Forrest
United States District Judge

Respectfully submitted,

/s/ Pamela Rogers Chepiga

Pamela Rogers Chepiga

Copy via email: John P. Coffey

Matthew Martens, SEC
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